CV 0 427

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

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GARY DUEY DULA, PLAINTIFF PRO SE	*	
6207 TECUMSEH PLACE		
BERWYN HEIGHTS, MARYLAND 20740		
PHONE: 301-441-3669 (HOME AND WORK)	*	
v.		
NATIONAL SECURITY AGENCY,	*	DKC 08 CV
AND		
		CIVIL ACTION NO
ITT CORPORATION		
4 WEST RED OAK LANE	*	
WHITE PLAINS, NY 10604		
AND		
NORTHROP GRUMMAN CORPORATION	*	
1840 CENTURY PARK EAST		
LOS ANGELES, CA 90067		
,	*	
* * * * * * * * * * * * * * * * * * * *	* *	
COMPLAI	NT	

I.

1. For his Complaint the Plaintiff pro se is seeking from this Honorable Court a <u>immediate injunction</u> against the Defendants and those acting on their behalf, to halt illegal acts perpetrated against the defendant and his family. These illegal acts are being perpetrated against the Plaintiff <u>and his family</u> by persons associated with the National Security Agency (NSA), possibly other U.S. intelligence agencies, and others believed to be acting on their behalf in a supporting role including employees and staff of ITT Corporation (formerly ITT/AES Industries, Inc., Reston, Virginia) and Northrop Grumman Corporation. These illegal acts include identity theft, illegal searches, seizures, and thefts from Plaintiff's residence, false arrest, false imprisonment, medical fraud, falsification of documents relating to a national security clearance, falsification of employment records, and other offenses. These acts being perpetrated against the Plaintiff <u>and his family</u> are believed to be done under the direction of the NSA and other U.S. intelligence agencies. Specific details of the source of authority are unknown to and cannot be ascertained

by the Plaintiff. These illegal acts which include medical fraud are ongoing in nature and also stated in the complaint of a related case in U.S. District Court for the District of Columbia, Civil Case Number: 08-0196 filed on February 4, 2008 and in the proceedings of Anne Arundel County Circuit Case Number: 02-C-07-122288AA. Most of the events that form the basis for this cause of action occurred in the Maryland District (Fourth Circuit), the Virginia Eastern District (Fourth Circuit) and the District of Columbia (D.C. Circuit).

2. In this Complaint, the Plaintiff also seeks compensatory damages equal to the time expended by the Plaintiff in defending against the alleged fraud of approximately one (1) years salary (\$100K) plus other reasonable costs incurred (less than \$25K). Plaintiff also seeks an <u>immediate injunction</u> against the defendants and those acting on their behalf to force cessation of these activities. Additionally, Plaintiff seeks punitive damages of two million dollars (\$2M), which may be waived wholly or in part if swift cessation of these activities can be attained, the compensatory damages are uncontested, and Plaintiffs medical records are properly corrected to remove fraudulent information.

II.

1. Plaintiff seeks an <u>immediate injunction</u> from this court to halt ongoing violations of U.S. Constitutional Rights under the Fourth Amendment and under USC-42 including Unlawful Searches and Seizures of Property (personal residences), and failure to provide Equal Protection assured under the Amendment. Throughout the U.S. Judicial Districts in Maryland, Virginia, and The District of Columbia Plaintiff's access to the Office of the U.S. Attorney and the U.S. District Courts has been impeded by individuals believed to be acting on behalf of the NSA and possibly other U.S. intelligence agencies. Additionally, access to Maryland States Attorney, Maryland District and Circuit Courts, and independent representative council has been impeded. In his Complaint the Plaintiff seeks an <u>immediate injunction</u> against the NSA, other U.S. intelligence agencies, and any and all other parties that may be acting on their behalf to halt ongoing rights violations against the Plaintiff.

III.

- 1. The Plaintiff pro se is a U.S. citizen residing in this district, the Maryland District, Fourth Circuit.
- 2. The National Security Agency (NSA) is a U.S. government agency under the U.S. Department of Defense located at Fort George G. Meade, Maryland, 20755. The NSA therefore also is located in this district, the Maryland District, Fourth Circuit.
- 3. ITT Corporation is a U.S. Corporation headquartered in White Plains, New York.
- 4. Northrop Grumman Corporation is a U.S. corporation headquartered in Los Angeles, California.
- 5. Plaintiff claims that the Maryland District, Fourth Circuit has in personam and diversity jurisdiction and at issue in this complaint is a federal question relating to rights guaranteed under the Fourth Amendment to the U.S. Constitution for consideration before this Honorable Court.
- 6. Plaintiff requests a trial by jury.

Gary Duey Dula, Plaintiff pro se

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Berwyn Heights, MD 20740

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